

HONE LAW

Eric D. Hone, NV Bar No. 8499

ehone@hone.law

Joel Z. Schwarz, NV Bar No. 9181

jschwarz@hone.law

701 N. Green Valley Parkway, Suite 200

Henderson, NV 89074

Phone 702-608-3720

Fax 702-703-1063

O'MELVENY & MYERS LLP

Molly M. Lens, Esq.

mlens@omm.com

(Pro Hac Vice Application to be Submitted)

1999 Avenue of the Stars, 8th Floor

Los Angeles, CA 90067

Phone 310-246-8593

*Attorneys for Defendants FREMANTLE
PRODUCTIONS NORTH AMERICA, INC. and
MARATHON PRODUCTIONS, INC.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUSSEL G. GREER,

Plaintiff,

v.

FREMANTLE PRODUCTIONS NORTH
AMERICA, INC, a corporation and
MARATHON PRODUCTIONS, INC, a
corporation,

Defendants.

Case No. 2:21-cv-01905-RFB-NJK

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO AMENDED MOTION
FOR PRELIMINARY INJUNCTION
[ECF NO. 27]**

Plaintiff Russell G. Greer ("Greer"), in pro per person, and Defendants Fremantle Productions North America, Inc. and Marathon Productions, Inc. (collectively, "Fremantle"), by and through counsel, hereby agree and stipulate as follows:

WHEREAS, on January 28, 2022, Greer filed an Amended Motion for a Preliminary Injunction (the "PI Motion"), *see* ECF 27;

WHEREAS, Fremantle's deadline to oppose the PI Motion is February 11, 2022;

WHEREAS, Fremantle intends to move to compel arbitration and will file such motion on or before February 7, 2022;



1 WHEREAS, the Parties agree that—for party and judicial efficiency—the Court should
2 resolve Fremantle’s forthcoming Motion to Compel Arbitration before resolving the PI Motion;

3 WHEREAS, the Parties agree that Fremantle should not oppose the PI Motion until and
4 unless the Court denies Fremantle’s Motion to Compel Arbitration and that Fremantle shall have
5 at least two weeks from such order to oppose the PI Motion in such event;

6 WHEREAS, the Parties otherwise reserve all rights.

7 Dated this 3rd day of February 2022.

Dated this 3rd day of February 2022. H1

8 RUSSELL G. GREER

LAW GROUP

9 /s/ Russell G. Greer

/s/ Joel Z. Schwarz

10 Russell G. Greer
11 russmark@gmail.com
12 P.O. Box 46602
13 Las Vegas, NV 89114
14 Phone 801-895-3501

Joel Z. Schwarz, NV Bar No. 9181
joel@h1lawgroup.com
701 N. Green Valley Parkway, Suite 200
Henderson, NV 89074
Phone 702-608-3720

15 *Pro Se Litigant*

Attorneys for Defendants

16 **IT IS SO ORDERED:**

17 
18 **RICHARD E. BOULWARE, II**
19 **United States District Court**

20 DATED this 8th day of February, 2022.
21
22
23
24
25
26
27
28

